

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

KIDANEMARIAM KASSA,)	
)	
Plaintiff,)	
)	
v.)	CIVIL RIGHTS COMPLAINT
)	42 U.S.C. §1983
)	
)	CIVIL ACTION NO.
)	1:17-CV-02068-AT
FULTON COUNTY, GEORGIA,)	
PAUL H. HOWARD, officially &)	
Individually,)	
ANTIONETTE STEPHENSON,)	
individually, PIERRE EASLEY,)	
individually, and JOHN DOE,)	
officially & individually,)	
)	
Defendants.)	
)	

**DEFENDANT PIERRE EASLEY'S SPECIAL APPEARANCE MOTION TO DISMISS
PURSUANT TO FED.R.CIV.P. 12(b)(2), 12(b)(5) AND 12(b)(6)¹**

COMES NOW Defendant Pierre Easley ("Defendant"), by and through undersigned counsel and in his individual capacity, and moves this Honorable Court to dismiss the claims asserted against him in Plaintiff's Civil Rights Complaint due to insufficiency of service of process, the Court's lack of personal jurisdiction, and Plaintiff's failure to state a claim upon which relief can be granted. Defendant moves this Court to

¹ Defendant files this motion to dismiss by special appearance only, without waiving the defenses of insufficiency of process, subject matter jurisdiction and venue or submitting himself to the jurisdiction of this Court.

grant the instant Special Appearance Motion to Dismiss for the reasons more fully shown in the Brief in Support of Defendant's Special Appearance Motion to Dismiss. The legal authority supporting this motion is filed contemporaneously herewith.

Respectfully submitted, this 25th day of September, 2017.

OFFICE OF THE COUNTY ATTORNEY

Patrise Perkins-Hooker
COUNTY ATTORNEY
Georgia Bar No. 572358

Kaye W. Burwell
Deputy County Attorney
Georgia Bar No. 775060

/s/ Ashley J. Palmer
Ashley J. Palmer
Senior Assistant County Attorney
Georgia State Bar No. 603514

OFFICE OF THE FULTON COUNTY ATTORNEY

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CERTIFICATE OF SERVICE

THIS CERTIFIES that on September 25, 2017, I presented this document in Courier New, 12 point type, and that I have electronically filed the foregoing **DEFENDANT PIERRE EASLEY'S SPECIAL APPEARANCE MOTION TO DISMISS PURSUANT TO FED.R.CIV.P. 12(b)(2), 12(b)(5) AND 12(b)(6)** with the Clerk of Court using the CM/ECF system, and will provide mail notification to the following attorney of record:

Tiffany Williams Roberts
Tiffany W. Roberts, Attorney at Law
Suite 400
235 Peachtree Street
Atlanta, Georgia 30303

This 25th day of September, 2017.

/s/ Ashley J. Palmer

Ashley J. Palmer
Senior Assistant County Attorney
Georgia State Bar No.: 603514

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